



U.S. Department of Justice

United States Attorney
Southern District of New York

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August 25, 2020

BY ECF AND ELECTRONIC MAIL

Hon. Victor Marrero, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants (the “Government”) in the above-referenced case. We write on behalf of all of the parties in this matter, after having conferred with Plaintiffs’ counsel, jointly and respectfully to request a one-week adjournment of the briefing deadlines set forth in the Court’s order issued on August 20, 2020 (ECF No. 11). This is the parties’ first request for an adjournment of these deadlines.

In his testimony before the House Oversight and Reform Committee on August 24, 2020, Defendant DeJoy “commit[ted] to give the committee an update on the improvement of” certain postal services on Monday, August 31, 2020. Per the briefing schedule currently in place, Plaintiffs’ preliminary injunction papers are due on August 26, 2020, Defendants’ opposition papers are due on August 31, 2020, and Plaintiffs’ reply is due on September 1, 2020. *See* ECF No. 11. The parties have conferred and agree that the interests of judicial efficiency and clarity may best be served by adjourning this schedule for approximately one week, so that the parties may review and consider the forthcoming update before they submit briefing to the Court. Therefore, the parties jointly and respectfully request that the Court endorse the following adjusted deadlines¹:

- Plaintiffs will serve their motion papers on Defendants on or before September 2, 2020;
- Defendants will serve their opposition on Plaintiffs on or before September 8, 2020;
- Plaintiffs will serve their reply, if any, on September 9, 2020.

¹ The parties jointly agree that the scheduling adjournment requested herein does not, in and of itself, constitute grounds to seek the dismissal or denial of any claim or argument that the parties may assert in this case.

We thank the Court for its consideration of this request.

Respectfully,

COHEN&GREEN P.L.L.C.
Attorneys for Plaintiffs

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